

Thank you for your comment, Tim Eder.

The comment tracking number that has been assigned to your comment is GLMRISBRS50012.

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GLMRIS Brandon Road Scoping
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First Name: Tim
Middle Initial:
Last Name: Eder
Organization: Great Lakes Commission
Address:
Address 2:
Address 3:
City:
State:
Zip: 48104
Country:
Attachment: GLMRIS-Brandon Road Scoping_Great Lakes Commission Comments_January 30 2015_With Attachments.pdf

Comment Submitted:

Please see attached

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*Ensuring environmental and
economic prosperity for the Great
Lakes-St. Lawrence region through
communications, policy research and
development, and advocacy.*

January 30, 2015

Mr. Dave Wethington, P.E.
GLMRIS Project Manager
U.S. Army Corps of Engineers - Chicago District
231 S. LaSalle Street, Suite 1500
Chicago, IL 60604

RE: Public comments on the GLMRIS - Brandon Road Scoping Effort

Dear Mr. Wethington:

I am writing on behalf of the Great Lakes Commission (GLC) to provide comments on the Army Corps of Engineers' evaluation of potential aquatic nuisance species (ANS) control technologies to reduce the risk of interbasin transfer of ANS through the Chicago Area Waterway System (CAWS) and to assess the viability of establishing a single point to control one-way, upstream ANS transfer from the Mississippi River Basin into the Great Lakes Basin near the Brandon Road Lock and Dam. The Commission strongly supports this effort and urges the Corps to move as quickly as possible to develop a feasibility study and cost estimate as a basis for Congressional authorization and funding. This effort is consistent with recommendations in the Commission's March 2014 policy resolution and the August 2014 letter from the Chicago Area Waterway System Advisory Committee (both are attached and incorporated by reference).

The Commission remains committed to finding a comprehensive, long-term solution to prevent all ANS transfer through the CAWS while maintaining the system's benefits for flood control, water quality, transportation and recreation. However, it is vital that we quickly implement interim control measures to reduce the risk of ANS transfer—with a focus on preventing Asian carp from entering the CAWS from the Illinois River—during the longer timeframe needed to develop and implement such a solution. I believe there is firm support for this work from the Great Lakes states, regional stakeholders and Congress.

The Corps' evaluation of control measures and options for configuring them at Brandon Road should be conducted in the context of, and with the intent to apply them, to a long-term solution to prevent all ANS transfer through the CAWS. Thus, technologies, structural options and their associated assemblages should be evaluated both for implementation at Brandon Road *as well as* other locations in the CAWS. Where possible, the feasibility evaluation should also consider applications outside of the Great Lakes basin to inform ANS control efforts in other areas and generate value for the nation as a whole from this work.

It is important that the Corps' work consider and incorporate all relevant research from other federal and state agencies, academia and industry to ensure that all potentially useful technologies and control measures are considered. Toward this end, the Corps should coordinate closely with all relevant entities, clarify the criteria for considering technologies, and establish clear deadlines by which they will be reviewed by Corps staff. The Corps should re-establish the Executive Steering Committee that helped guide GLMRIS to interact with states and governmental entities, including the GLC. Working through the Executive Steering Committee and the Asian Carp Regional Coordinating Committee, the Corps should communicate a schedule for making decisions on technologies and control measures and other elements of the evaluation to ensure input and assistance is received in a

timely manner. It is imperative that important research and technical support from other federal and state agencies be effectively incorporated into the Corps' study process.

As part of the evaluation we specifically urge the Corps to consider the "GLMRIS lock" as an option, with appropriate variations related to its configuration (both as a new lock and retrofitting of existing locks), flushing mechanism, use of treated water or water from an ANS-free buffer zone, and related issues. Significant questions remain regarding the efficacy of this concept, the level of risk reduction it will provide, costs, and other issues. These must be fully explored to determine the feasibility of using this approach at Brandon Road and elsewhere in the CAWS. This is a key example of how the Brandon Road evaluation can – and should – support and inform efforts to develop a comprehensive, long-term solution to prevent ANS transfer through the CAWS.

We urge the Corps to include funding for the Brandon Road evaluation in its base budget, recognizing this and related ANS control efforts as an ongoing need. The Great Lakes Restoration Initiative (GLRI) may be a source of funding for this work and we support that if necessary. However, ANS control is a long-term challenge and should be budgeted for from the Corps' base budget.

We are pleased that the Corps is moving forward with this important study effort and ask that it be accelerated to the maximum extent possible to provide the Great Lakes states, Congress and regional stakeholders with feasible, near-term solutions to reduce the risk of Asian carp and other aquatic nuisance species entering the Great Lakes through the CAWS. We appreciate your considering our comments and look forward to supporting your work. If you have questions, please contact me at 734-971-9135, teder@glc.org.

Sincerely,



Tim Eder
Executive Director

Attachments:

- March 2014 Great Lakes Commission resolution, *Preventing the interbasin transfer of Asian carp and other invasive species*.
- August 2014 letter to Congress from the Chicago Area Waterway System Advisory Committee regarding short-term control measures at the Brandon Road lock and dam.

Adopted March 5, 2014

Preventing the interbasin transfer of Asian carp and other invasive species

Whereas, Asian carp pose an imminent threat to the Great Lakes and St. Lawrence River ecosystem and economy because of their ability to reproduce rapidly and consume large quantities of food; and

Whereas, if populations of Asian carp become established in the Great Lakes and St. Lawrence River they will be difficult, if not impossible, to control or eradicate and thus the federal government has recognized Asian carp as “the most acute [aquatic invasive species] threat facing the Great Lakes today”; and

Whereas, extensive monitoring and control efforts including commercial fishing in the Illinois River, led by the Illinois Department of Natural Resources and its federal partners, are important interim control measures, while long-term solutions are pursued; and

Whereas, a recent study conducted by the Army Corps of Engineers and the U.S. Fish and Wildlife Service showed that the electric barriers in the CAWS are not effective in stopping the movement of all fish, especially small fish, and that barges can sweep fish through the electric barrier; and

Whereas, the Army Corps of Engineers has identified 13 aquatic invasive species (AIS) with a high or medium risk of passing through the CAWS into either the Great Lakes or Mississippi River basins that likely would cause harmful impacts on the basin being invaded; and

Whereas, the Army Corps of Engineers has identified 17 other pathways, in addition to the CAWS, through which AIS may be able to pass between the Great Lakes and Mississippi River basins; and

Whereas, the states of Indiana and Ohio are working with federal partners to close connection points in Eagle Marsh and Ohio waterways; and

Whereas, the State of Wisconsin has permanently closed the Rapide Croche Lock on the Fox River to prevent the passage of aquatic invasive species from Lake Michigan into the Fox River; and

Whereas, the State of Minnesota is actively developing and investing in measures to combat further spread of Asian carp to its inland lakes and rivers, including possible closure of the most upstream Mississippi River lock in Minneapolis; and

Whereas, the Great Lakes governors and premiers of Ontario and Québec have committed to work together to prevent the introduction of new aquatic invasive species, and to develop a mutual aid agreement to facilitate cooperative response actions in the event of detection of new aquatic invasive species that threaten the region; and

Whereas, preventing the spread of Asian carp is a national problem – as evidenced by control efforts also underway in the Ohio River and Upper Mississippi River – and research and control actions in the Great Lakes can support and will be relevant for efforts in other parts of the country; and

Whereas, the *Restoring the Natural Divide* report prepared in 2012 by the Great Lakes Commission and the Great Lakes and St. Lawrence Cities Initiative presented three alternatives for separating the Great Lakes and Mississippi

River watersheds in the CAWS to provide a long-term solution that prevents AIS transfer while maintaining or enhancing the system's benefits for flood protection, water quality and waterborne transportation; and

Whereas, the Army Corps of Engineers has released the *Great Lakes and Mississippi River Interbasin Study* (GLMRIS) presenting a range of eight options to reduce risk of AIS movement between the Great Lakes and Mississippi River basins, including two alternatives for full hydrological separation; and

Whereas, the GLMRIS report recognizes the hydrologic separation options as the most effective at keeping Asian carp out of the Great Lakes; and

Whereas, the GLMRIS report does not recommend a preferred alternative and the Corps of Engineers has not provided direction on next steps, emphasizing that “ANS control is a shared responsibility” and “continued participation by stakeholders is essential to reach a decision and authorization for a collaborative path forward”; and

Whereas, the Great Lakes Commission has determined that immediate action is needed to identify short-term steps that can be implemented quickly to reduce risk while continuing to build consensus around a long-term solution.

Therefore, Be It Resolved, that the Great Lakes Commission calls for continued action by federal partners to support states in their efforts to further modify waterways and construct barriers to reduce and strive to eliminate the degree of risk from connection points outside of the CAWS; and

Be It Further Resolved, that the Great Lakes Commission calls for immediate action on a suite of near-term measures to reduce the risk of interbasin transfer of Asian carp and other invasive species at the CAWS, including:

- continued implementation of the Asian Carp Control Strategy Framework and related efforts;
- immediate implementation of additional control measures as generally outlined in the GLMRIS alternative two (such as use of chemical controls, ballast and bilge management, habitat alternation, and controlled harvesting and overfishing);
- within three years, design, engineer and construct modifications to the Brandon Road lock and dam structure to reduce the risk of one-way transfer (into Lake Michigan), including additional electric barriers at the entrance and exit of the lock, use of fish deterrents, modifications to the gates on the dam, and other technologies;
- design, engineer and test the “GLMRIS lock,” as a national demonstration project, to determine its viability and effectiveness at stopping both one- and two-way transfer and cost; and

Be It Further Resolved, while near-term control measures are vital, it is critical that long-term solutions, which may include ecological and/or physical separation, be implemented quickly consistent with the continued movement of Asian carps and other invasive species toward the Great Lakes, and from the Great Lakes toward the Mississippi River basin; and

Be It Further Resolved, that efforts to develop and reach regional consensus within both the Great Lakes and Mississippi River basins on long-term solutions to prevent interbasin transfer of aquatic invasive species should be accelerated and should include input from the states, the provinces of Ontario and Québec, the full range of affected stakeholders, and that an advisory committee assembled by the Great Lakes Commission and the Great Lakes and St. Lawrence Cities Initiative be requested to provide input on solutions in and affecting northeast Illinois and northwest Indiana; and

Be It Further Resolved, that long-term solutions must strive to eliminate risk and prevent the interbasin transfer of all aquatic invasive species while mitigating potential negative impacts on current flood risk management, water quality protection, recreation, and commercial transportation priorities in northeast Illinois and northwest Indiana; and

Be It Further Resolved, that commercial navigation industries are called upon to identify practices to reduce the risk of aquatic invasive species transfer that will be instituted on an escalating pace commensurate with increasing risk of interbasin transfer of Asian carp and other invasive species during their advance toward Lake Michigan; and

Be it Further Resolved, that the Great Lakes Commission calls on the U.S. Department of Transportation to conduct a study on the current status, projected trends, and infrastructure and related needs to support the long-term economic viability of commercial transportation on the CAWS, including opportunities for improved multi-modal connectivity, and that this study be conducted in collaboration with other federal agencies, the Great Lakes states, existing users of the CAWS and other interested parties; and

Be It Further Resolved, to complement what is expected to be a substantial commitment of federal resources to address solutions, the Great Lakes states and provinces note that they are currently investing substantial state and provincial resources including development of the new mutual aid agreement, resources for research, prevention and enforcement, surveillance, management and public education programs and, further, that the states and provinces are willing to engage in further dialogue on potential for financing approaches that recognize aquatic invasive species prevention and control as a shared responsibility; and

Be It Finally Resolved, that the Great Lakes Commission calls on the Obama Administration to increase its leadership to resolve the challenge of preventing AIS transfer between the Great Lakes and Mississippi River basins through the Council on Environmental Quality and that the Department of Interior should be delegated the lead role and provided with the resources necessary to coordinate efforts of all other federal agencies.

August 25, 2014

Dear Members of the Great Lakes Congressional Delegation:

This letter is written on behalf of the Advisory Committee for the Chicago Area Waterway System (CAWS). The committee includes representatives from 32 public and private stakeholders that benefit from and have responsibilities related to the CAWS, as well as regional stakeholder groups representing commercial, recreational, and environmental interests. We ask for your support to 1) direct the Army Corps of Engineers to take action on the requests below, and 2) to fund those actions. Further, we request that the studies outlined below result in decision-making documents that provide an actionable path forward for short-term measures that will reduce the risk of aquatic invasive species including Asian carp (AIS) reaching the Great Lakes from the Mississippi River system.

As a follow up to the Great Lakes and Mississippi River Interbasin Study (GLMRIS), the Advisory Committee is committed to finding a two-way, long-term solution that prevents the inter-basin transfer of AIS while also maintaining or enhancing transportation, maritime commerce, water quality, recreation, and flood protection in the region. The Advisory Committee is working to develop consensus recommendations on a long-term solution by December 2015. The Committee also supports the ongoing work of the Asian Carp Regional Coordinating Committee (ACRCC). The investments we are proposing below will develop and demonstrate control technologies for near-term actions to reduce the risk of transfer of AIS into the Great Lakes.

The Advisory Committee believes that the Brandon Road lock and dam is an important site for a demonstration of additional one-way measures to reduce the risk of upstream movement of AIS into both the CAWS and the Des Plaines River, while maintaining efficient navigation.¹ Control measures at Brandon Road can provide a degree of risk reduction now, and may be consistent with the ultimate long-term solution. This site can also serve as a valuable national proving ground to demonstrate technologies that can be used in other areas – such as the Ohio and Upper Mississippi rivers – to prevent the expansion of AIS. To be effective, an engineered channel at Brandon Road will be required and a full set of control technologies to be deployed there will need to be evaluated.

In addition to the consideration of short-term measures at Brandon Road, the Advisory Committee requests that additional studies be initiated now to evaluate the potential for new lock configurations and gate systems that are identified in the GLMRIS report. While any new lock configuration would be considered as part of a long-term solution, more work is required to fully understand this possibility.

The Advisory Committee asks that Congress support and fund the following:

1. **Design of a new engineered channel to be constructed in the approach to the Brandon Road lock.** The existing approach channels to the Brandon Road lock may lend themselves to construction of a new engineered channel. Such a channel would enable deployment of control technologies with greater effectiveness due to the narrower and more concentrated area on which they would be implemented.

¹ Efficient navigation means that the flow of traffic will not be significantly hindered during construction or after completion of construction by the new structures or technologies.

2. **Evaluation, engineering, and design of control technologies to deploy in the approach channel and the Brandon Road lock structure.** Several “add-on” control technologies are being evaluated as part of the Asian Carp Control Strategy Framework. These technologies could be used in the approach channel to deter AIS from entering the lock along with other control technologies in the existing lock to prevent AIS moving further upstream towards Lake Michigan. The Army Corps of Engineers, in collaboration with other federal and state agencies, should complete the evaluation, engineering, and design of appropriate control technologies that could be deployed at the Brandon Road lock and approach channel. Any technologies that are tested and/or employed at Brandon Road must take into account the important ecological value of the location, as the Brandon Road lock tail waters are critical habitat for this segment of the Des Plaines River.
3. **Research to further evaluate reconfiguring locks as a means to control aquatic invasive species.** The GLMRIS report proposed a new lock configuration and gate system that would allow boat traffic to pass between water bodies and that would exchange water in a way to prevent the passage of aquatic organisms. If such a concept is proven to be feasible, it could be deployed in the CAWS as part of a long-term solution. It could also be used in other river systems to prevent the movement of AIS. However, significant questions remain regarding its potential effectiveness. One concern is whether such locks could adequately flush out species or whether additional treatment technologies will be required. Further, the overall cost and time frame for deployment and impacts on the water system as a whole and commercial navigation need to be identified before proceeding to full engineering and design. The Advisory Committee supports initial research and design necessary to further evaluate the concept’s effectiveness in preventing AIS transfer.

Request: The Advisory Committee requests that Congress provide \$8 million, and additional funding levels as appropriate, to the Army Corps of Engineers in FY 2015 to conduct the above studies. Upon approval of funding, the Army Corps of Engineers should be directed to provide to Congress, within six months, a detailed schedule and cost estimate for completing the necessary studies for the above projects. The studies will result in design and engineering analysis as well as projected design and construction costs, timelines, and any new legislative authority required to implement the projects.

The Army Corps of Engineers should be instructed to complete these investigations within two years and to coordinate with other federal and state agencies and non-federal partners via the Asian Carp Regional Coordinating Committee and to report to the Advisory Committee. In addition to these specific investigations and reports, the Advisory Committee asks that the Army Corps of Engineers provide Congress with a decision-making document that incorporates the Corps’ traditional principles, guidelines and policies, including the evaluation of alternatives, selection of a recommended plan, and compliance with applicable environmental statutes. This should be sufficient to enable Congress to authorize and fund, and the Army Corps of Engineers to proceed to implementation of, a recommended plan for near-term measures.

These requests reflect the consensus of the Advisory Committee. We appreciate your support for these urgent and immediate actions to strengthen protections against the movement of AIS into the Great Lakes.

Sincerely,

Alliance for the Great Lakes

Joel Brammeier, President and CEO
Ph: 312-445-9727
jbrammeier@greatlakes.org

American Waterways Operators

Lynn Muench, Senior Vice President,
Regional Advocacy
Ph: 314-308-0378
lmuench@vesselalliance.com

Chemical Industry Council of Illinois

Mark Biel, Executive Director
Ph: 217-522-5805
mbiel@cicil.net

Chicago Metropolitan Agency for Planning

Timothy Loftus, Water Resources Planner
Ph: 312-386-8666
tloftus@cmaph.illinois.gov

Council of Great Lakes Industries

Kathryn Buckner, President
Ph: 734-663-1944
kabuckner@cgli.org

Environmental Law and Policy Center

Howard Learner, President and Executive Director
Ph: 312-673-6500
hlearner@elpc.org

Friends of the Chicago River

Maddie Mahan, Policy and Planning Specialist
Ph: 312-939-0490, ext. 22
mmahan@chicagoriver.org

General Iron Industries, Inc.

Jim Kallas
Ph: 847-508-9170
jim@general-iron.com

Great Lakes and St. Lawrence Cities Initiative

Dave Ullrich, Executive Director
Ph: 312-201-4516
david.ullrich@glslcities.org

Great Lakes Commission

Tim Eder, Executive Director
Ph: 734-971-9135
teder@glc.org

Great Lakes Panel on Aquatic Nuisance Species (GLP)

John Navarro, GLP Chair
Ohio Department of Natural Resources
Ph: 614-265-6346
john.navarro@dnr.state.oh.us

Great Lakes Sport Fishing Council

Dan Thomas, President
Ph: 630-941-1351
dan@great-lakes.org

Healing Our Waters—Great Lakes Coalition

Todd Ambs, Campaign Director
Ph: 608-692-9974
AmbsT@nwf.org

Illinois Chamber of Commerce

Benjamin J. Brockschmidt, Executive Director, Infrastructure Council
Ph: 312-983-7100
bbrockschmidt@ilchamber.org

Illinois Farm Bureau

Kevin Rund, Sr. Director of Local Government, Ill. Agricultural Association
Ph: 309-557-3274
KRund@ilfb.org

Illinois International Port District

Frank Kudrna, Principal Water Resources Engineer, URS Corp.
Ph: 312-596-6727
fkudrna@comcast.net

Illinois River Carriers Association

John Kindra, President, Kindra Lake Towing
Ph: 773-721-1180
jkindra@kindralake.com

Lake Erie Charter Boat Association

Rick Unger, Executive Director
Ph: 216-401-6231
rungerchpd@aol.com

Metropolitan Mayors Caucus

Mayor John D. Noak, Village of Romeoville
Ph: 815-886-7200
jnoak@romeoville.org

Mayor Domingo Vargas, City of Blue Island

Ph: 708-597-8603
dvargas@cityofblueisland.org

Metropolitan Planning Council

Josh Ellis, Program Director
Ph: 312-863-6045
jellis@metroplanning.org

Metropolitan Water Reclamation District of Greater Chicago

David St. Pierre, Executive Director
Ph: 312-751-7900
david.stpierre@mwrd.org

Mississippi Interstate Cooperative Resource Association (MICRA)

Bobby Wilson, MICRA Chair
Chief, Fisheries Division, Tennessee Wildlife Resources Agency
Ph: 615-781-6575
Bobby.Wilson@tn.gov

Mid-West Truckers Association

Don Schaefer, Executive Vice President
Ph: 217-525-0310
Dhscubs@aol.com

National Wildlife Federation

Marc Smith, Policy Director, Great Lakes Regional Center
Ph: 734-887-7116
msmith@nwf.org

Natural Resources Defense Council

Meleah Geertsma, Staff Attorney
Ph: 312-651-7904
mgeertsma@nrdc.org

The Nature Conservancy

Dave Hamilton, Senior Policy Director
Ph: 517-316-2222
dhamilton@tnc.org

Northeast Ohio Mayors & City Managers Association

Mayor Debbie Sutherland, City of Bay Village
Ph: 440-899-3415
dsutherland@cityofbayvillage.com

Northwest Indiana Forum

Kay Nelson, Director of Environmental Affairs
Ph: 219-763-6303, ext.186
knelson@nwiforum.org

Ontario Federation of Anglers & Hunters

Matt DeMille, Manager, Fish & Wildlife Services
Ph: 705-748-6324, ext. 249
matt_demille@ofah.org

Passenger Vessel Association & Wendella Sightseeing

Michael Borgstrom, President, Wendella Sightseeing
Ph: 312-205-4044
msb@wendellaboats.com

Prairie Rivers Network

Robert Hirschfeld, Water Policy Specialist
Ph: 217-344-2371 x205
rhirschfeld@prairierivers.org

Sierra Club - Illinois Chapter

Jack Darin, Director
Ph: 312-251-1680
jack.darin@sierraclub.org